

March 30, 2021

21cr221

VIA E-MAIL

MEMO ENDORSED

Honorable Sidney H. Stein
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Victor Rivera, Case No. 21-CR-___ (SHS)

Dear Judge Stein:

As the Court may recall, this firm represents defendant Victor Rivera in the referenced matter (for which no case number has yet been assigned). Mr. Rivera self-surrendered and made his initial appearance before this Court on March 24, 2021, at which time he was released principally on a \$100,000 Personal Recognizance Bond that he signed along with certain travel restrictions. I write today to seek the following revisions to the terms of Mr. Rivera's release on bail. I have spoken with Assistant United States Attorney David Abramowicz and U.S. Pretrial Services Officer Shawn Bostic, both of whom consent to the proposed changes set forth below.

First, as a condition of his release, this Court limited Mr. Rivera's travel to the Southern and Eastern Districts of New York and the District of New Jersey. Since that date we have learned (through Mr. Bostic's discussions with Mr. Rivera) that the work in which Mr. Rivera intends to engage following his termination by his former employer may require his travel to the Northern and Western Districts of New York. We therefore respectfully request that this Court modify the terms of Mr. Rivera's release to include authorization to travel to the Northern and Western Districts of New York for purposes of work.

Second, this Court conditioned Mr. Rivera's release on the surrender of his wife's passport. Mr. Rivera's wife, though, does not wish to surrender her passport. We therefore seek to substitute a second financially responsible signatory to Mr. Rivera's \$100,000 Personal Recognizance Bond as an alternative to the surrender of Mr. Rivera's wife's passport. We respectfully submit that the addition of that second financially responsible signatory will provide the same assurance against flight that the surrender of Mr. Rivera's wife's passport would. If

such a substitution is acceptable to the Court, we will work with the government to identify a second financially responsible signatory and have that second signatory execute Mr. Rivera's \$100,000 Personal Recognizance bond within the next seven days (that is, by April 6, 2021).

Thank you for your consideration and attention to this matter.

Respectfully submitted,

/s/

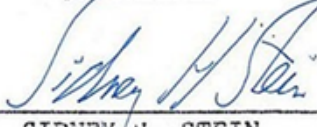
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cc: David Abramowicz, Esq. (via e-mail)
Assistant United States Attorney

Shawn Bostic (via e-mail)
U.S. Pretrial Services Officer

Defendant's request to modify his bail conditions as set forth in this letter is granted.

**Dated: New York, New York
April 1, 2021**

SO ORDERED

SIDNEY H. STEIN
U.S.D.J.